

[SUBMITTING COUNSEL ON SIGNATURE
PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN NYPL, et al.,

Plaintiffs,

v.

JPMORGAN CHASE & CO., et al.,

Defendants.

Case No. 3:15-cv-02290-VC

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING BRIEFING
SCHEDULE ON DEFENDANTS' MOTION
TO TRANSFER UNDER 28 U.S.C. § 1404
AND CONTINUANCE OF CASE
MANAGEMENT CONFERENCE
[CURRENTLY SCHEDULED FOR
OCTOBER 27]**

1 WHEREAS Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders,
2 Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel (collectively,
3 “Plaintiffs”), and Defendants J.P. Morgan Chase & Co., J.P. Morgan Chase N.A., Bank of America
4 NA, HSBC Finance Corporation, HSBC Bank USA, HSBC North America Holdings, Inc., HSBC
5 Holdings plc, Citigroup, Inc., UBS AG, Barclays PLC, Royal Bank of Scotland* (collectively,
6 “Defendants”), have agreed, at the Court’s direction, to continue the hearing date on Defendants’
7 Motion to Transfer Under 28 U.S.C. § 1404 (“Transfer Motion”) to November 12, 2015, at
8 10:00 a.m.;

9 WHEREAS, the parties believe it will conserve judicial and party resources for the Transfer
10 Motion to be heard before the Case Management Conference currently scheduled for October 27,
11 2015;

12 THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE
13 UNDERSIGNED COUNSEL, HEREBY STIPULATE, AND THE COURT ORDERS AS
14 FOLLOWS:

15 1. Plaintiffs shall file and serve their opposition to the Transfer Motion on or before
16 October 14, 2015;

17 2. Defendants shall file and serve their reply on the Transfer Motion on or before
18 October 28, 2015;

19 3. The date of the Case Management Conference shall be continued to
20 December 1, 2015, at 10:00 a.m.

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26 * The First Amended Complaint names as a Defendant “Royal Bank of Scotland,” which is not an
27 accurate corporate name. For present purposes only, The Royal Bank of Scotland plc joins this
28 stipulation reserving all rights, including as to personal jurisdiction, subject to clarification and
revision if the case proceeds.

1
2 DATED: September 17, 2015

GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Joel S. Sanders

4 Joel S. Sanders
5 555 Mission Street, Suite 3000
6 San Francisco, CA 94105-2933
7 Telephone: (415) 393-8200
8 Facsimile: (415) 393-8206
9 jsanders@gibsondunn.com

Attorneys for Defendant UBS AG

10 DATED: September 17, 2015

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

11 By: /s/ Peter E. Greene

12 Peter E. Greene
13 Boris Bershteyn
14 Peter S. Julian
15 Four Times Square
16 New York, NY 10036
17 Telephone: (212) 735-3000
18 Facsimile: (212) 735-2000
19 peter.greene@skadden.com
20 boris.bershteyn@skadden.com
21 peter.julian@skadden.com

22 Douglas A. Smith
23 300 South Grand Avenue, Suite 3400
24 Los Angeles, CA 90071
25 Telephone: (213) 687-5000
26 Facsimile: (213) 687-5600

***Attorneys for Defendants JPMorgan Chase & Co. and
JPMorgan Chase Bank, N.A.***

1 DATED: September 17, 2015

SHEARMAN & STERLING LLP

2 By: /s/ Stephen D. Hibbard

3 Stephen D. Hibbard (SBN 177865)
4 525 Market Street, Suite 1500
5 San Francisco, CA 94105
6 Telephone: (415) 616-1100
7 Facsimile: (415) 616-1199
8 shibbard@shearman.com

9 Adam S. Hakki
10 Richard F. Schwed
11 Jeffrey J. Resetarits
12 599 Lexington Avenue
13 New York, New York 10022
14 Telephone: (212) 848-4000
15 Facsimile: (646) 848-7179
16 ahakki@shearman.com
17 rschwed@shearman.com
18 jeffrey.resetarits@shearman.com

***Attorneys for Defendants Bank of America Corporation
and Bank of America, N.A.***

15 DATED: September 17, 2015

LOCKE LORD LLP

16 By: /s/ Regina J. McClendon

17 Regina J. McClendon
18 44 Montgomery Street, Suite 4100
19 San Francisco, CA 94104
20 Telephone: (415) 318-8804
21 rmccclendon@lockelord.com

22 J. Matthew Goodin (*pro hac vice*)
23 111 S. Wacker Drive
24 Chicago, Illinois 60606
25 Telephone: (312) 443-0472
26 jmgoodin@lockelord.com

***Attorneys for Defendants HSBC Finance Corporation,
HSBC Bank USA, N.A., HSBC North America
Holdings, Inc., and HSBC Holdings plc***

1 DATED: September 17, 2015

COVINGTON & BURLING LLP

2 By: /s/ Tammy Albarrán

3 Tammy Albarrán
4 One Front Street
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-7066
7 talbarran@cov.com

Attorneys for Defendant Citigroup Inc.

8
9 DATED: September 17, 2015

DAVIS POLK & WARDWELL LLP

10 By: /s/ Neal A. Potischman

11 Neal A. Potischman (SBN 254862)
12 1600 El Camino Real
13 Menlo Park, CA 94025
14 Telephone: (650) 752-2000
15 Facsimile: (650) 752-2111
16 neal.potischman@davispolk.com

17 Joel M. Cohen (*pro hac vice*)
18 450 Lexington Avenue
19 New York, New York 10017
20 Telephone: (212) 450-4000
21 Facsimile: (212) 450-4800
22 joel.cohen@davispolk.com

*Attorneys for Defendant The Royal Bank of
Scotland plc*

DATED: September 17, 2015

SULLIVAN & CROMWELL LLP

By: /s/ Adam S. Paris

Adam S. Paris
John D. Echeverria
1888 Century Park East
Los Angeles, California 90067-1725
Telephone: (310) 712-6600
Facsimile: (310) 712-8800
parisa@sullcrom.com
echeverriaj@sullcrom.com

Attorneys for Defendant Barclays Bank PLC

1 DATED: September 17, 2015

ALIOTO LAW FIRM

2 By: /s/ Joseph M. Alioto

3 Joseph M. Alioto
4 Theresa D. Moore
5 Jamie Miller
6 One Sansome Street, Suite 3500
7 San Francisco, CA 94104
8 Telephone: (415) 434-8900
9 Facsimile: (415) 434-9200
10 jmliller@aliotolaw.com
11 tmoore@aliotolaw.com

12 ***Attorneys for Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders, Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel***

13 DATED: September 17, 2015

LAW OFFICES OF LINGEL H. WINTERS

14 By: /s/ Lingel H. Winters

15 Lingel H. Winters, Esq.
16 275 Battery Street, Suite 2600
17 San Francisco, California 94111
18 Telephone: (415) 398-2941
19 Facsimile: (415) 393-9887
20 sawmill2@aol.com

21 ***Attorney for Plaintiffs John Nypl, Lisa McCarthy, MAD Travel, Inc. a.k.a. Travel Leaders, Valarie Jolly, Go Everywhere, Inc., William Rubinsohn d.b.a. Rubinsohn Travel***

22 **ATTESTATION PURSUANT TO LOCAL CIVIL RULE 5-1**

23 Pursuant to Local Civil Rule 5-1 of the Northern District of California, I attest that
24 concurrence in the filing of the document has been obtained from each of the other signatories to this
25 document.

26 /s/ Joel S. Sanders
27 Joel S. Sanders
28

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 18, 2015



HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE

DECLARATION OF SERVICE

I, Joel S. Sanders, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California, 94105, in said County and State. On the date below, I served the within:

**STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING
SCHEDULE ON DEFENDANTS' MOTION TO TRANSFER UNDER 28 U.S.C.
§ 1404 AND CONTINUANCE OF CASE MANAGEMENT CONFERENCE
[CURRENTLY SCHEDULED FOR OCTOBER 27]**

to all named counsel of record as follows:



BY ECF (ELECTRONIC CASE FILING): I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service on September 17, 2015. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by me on September 17, 2015, at San Francisco, California.

/s/ Joel S. Sanders

Joel S. Sanders